

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ANTHONY MARCANTONI  
Plaintiff

V.

POLICE COMMISSIONER  
FREDERICK H. BEALEFELD, *et.al.*,  
Defendants

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Case No. 8:18-CV-00134

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**JOINT STATUS REPORT**

The Parties, through their respective counsel, state the status of the above-captioned matter and propose the following deadlines for discovery and dispositive motions in this matter:

**I. DEADLINES**

July 1, 2022:	Joint request for early settlement/ADR conference
July 1, 2022:	Report about deposition hours
July 1, 2022:	Initial report whether there is unanimous consent to proceed before a United States Magistrate Judge
July 1, 2022:	Deadline for Parties to submit agreed Protective Order to Court
October 3, 2022:	Moving for joinder of additional Parties and amendment of pleadings
December 1, 2022:	Plaintiff's Rule 26(a)(2) disclosures
January 30, 2023:	Defendant's Rule 26(a)(2) disclosures
March 15, 2023:	Plaintiff's Rebuttal Rule 26(a)(2) disclosures
April 15, 2023:	Rule 26(e)(2) supplementation of disclosures and responses
May 16, 2023	Discovery Deadline
May 23, 2023:	Submission of Status Report
June 1, 2023:	Requests for admission
June 30, 2023:	Dispositive Pre-Trial Motions Deadline

## **II. DISCOVERY.**

### Initial Disclosures

No initial disclosures need be made.

### Procedure

All provisions of Local Rule 104 apply, including the following:

- a. All discovery requests must be served in time to assure that they are answered before the discovery deadline. An extension of the deadline will not be made because of unanswered discovery requests.
- b. The existence of a discovery dispute as to one matter does not justify delay in taking any other discovery. The filing of a motion to compel or a motion for a protective order will not result in a general extension of the discovery deadline.
- c. No discovery materials, including Rule 26(a)(1) and Rule 26(a)(2) disclosures, should be filed with the court.
- d. Motion to compel shall be filed in accordance with Local Rule 104.8 and applicable CM/EMF procedures.

### Deposition Hours

The Parties agree to allocate a total of thirty (35) hours of deposition for fact witnesses.

## **III. STATUS REPORT**

The Parties agree to file a second status report the week after the discovery deadline covering the following matters:

- a. Whether discovery has been completed;
- b. Whether any Motions are pending;
- c. Whether any Party intends to file a dispositive pre-trial Motion;

- d. Whether the case is to be tried jury or non-jury and the anticipate length of trial;
- e. A certification that the parties have met to conduct serious settlement negotiations; and the date, time, and place of the meeting and the names of all persons participating therein;
- f. Whether each Party believes it would be helpful to refer this case to another judge of this court for settlement or other ADR conference, either before or after the resolution of any dispositive pretrial motion;
- g. Whether all Parties consent, pursuant to 28 U.S.C. §636(c), to have a U.S. Magistrate Judge conduct all further proceedings in this case, either before or after the resolution of any dispositive pre-trial motion, including trial (jury or non-jury) and entry of final judgement; and
- h. Any other matter requiring the Court's attention.

#### **IV. MOTIONS**

- 1. No Motions are currently pending.
- 2. Defendants intend to file a Motion for Summary Judgment by the June 30, 2023 dispositive motion deadline.

#### **V. TRIAL**

Plaintiff has requested a jury trial. It is anticipated that trial would last two (2) weeks.

#### **VI. SETTLEMENT DISCUSSIONS**

As of this Status Report, there have been no settlement discussions.

Respectfully submitted,

Date: May 27, 2022

/s/Michael A. Pichini

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 27<sup>th</sup> day of May 2022, a copy of the foregoing Notice of Appearance was served via the Court's CM/ECF system upon all counsel of record.

/s/Michael A. Pichini

Michael A. Pichini